



Order Filed on September 28, 2023  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-2(c)**

McGovern Legal Services, LLC

By: Marlena S. Diaz-Cobo, Esq.

850 Carolier Lane

North Brunswick, NJ 08902

(732) 246-1221

Attorneys for Mountainview at Greenbrook  
Condominium Association, Inc.

In Re:

STEVEN JONES

Case No.: 22-11927

Judge: Michael B. Kaplan

Chapter: 13

**CONSENT ORDER RESOLVING CREDITOR'S MOTION FOR STAY RELIEF**

The relief set forth on the following pages, numbered one (1) through four (4) is hereby **ORDERED**.

DATED: September 28, 2023

A handwritten signature in black ink, appearing to read "Michael B. Kaplan".

Honorable Michael B. Kaplan  
United States Bankruptcy Judge

McGOVERN LEGAL SERVICES, LLC  
BY: MARLENA S. DIAZ-COBO, ESQ.  
850 CAROLIER LANE  
NORTH BRUNSWICK, NEW JERSEY 08902  
(732) 246-1221

ATTORNEYS FOR MOUNTAINVIEW AT GREENBROOK CONDOMINIUM ASSOCIATION, INC.

In re:

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY  
IN PROCEEDINGS UNDER CHAPTER 13  
OF THE BANKRUPTCY CODE

STEVEN JONES

CASE NO.: 22-11927-MBK

Debtor.

CONSENT ORDER

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**CONSENT ORDER RESOLVING CREDITOR'S MOTION FOR STAY RELIEF**

**THIS MATTER** having been brought before the court by McGovern Legal Services, LLC, attorneys for creditor, Mountainview at Greenbrook Condominium Association, Inc. (the "Association"), by way of a Motion for Stay Relief and the parties having consented to the relief set forth herein, and for good cause shown and no cause to the contrary appearing;

**IT IS ORDERED, ADJUDGED AND DECREED THAT** the Debtor is indebted to the Association in the amount of \$5,252.00 in post-petition maintenance fees, late fees, fines, management fees and attorneys' fees related to the Association's attempts to collect unpaid post-petition fees through August 4, 2023 (the "Total Due").

The Total Due is detailed below:

Maintenance Fees (4/2022-8/2023):	\$3,302.00
Late Fees:	\$400.00
Fines:	\$225.00

Management Fees:	\$450.00
Legal (only work related to post-petition <u>Default 8/4/23)</u>	<u>\$875.00</u>
<b>Total:</b>	<b>\$5,252.00</b>

**IT IS FURTHER ORDERED, ADJUDGED AND DECREED THAT** the Debtor shall pay the Association \$1,500.00 on or before October 1, 2023, \$625.33 on or before November 1, 2023, \$625.33 on or before December 1, 2023, \$625.33 on or before January 1, 2024, \$625.33 on or before February 1, 2024, \$625.33 on or before March 1, 2024 and \$625.35 on or before April 1, 2024 (the "Cure Payments"). The Cure Payments shall be paid by personal or certified check made payable to Mountainview at Greenbrook Condominium Association, Inc. and received by McGovern Legal Services, LLC, 850 Carolier Lane, North Brunswick, NJ 08902.

**IT IS FURTHER ORDERED, ADJUDGED AND DECREED THAT** the Debtor shall maintain post-petition assessments and other post-petition obligations as they become due and owing to the Association commencing on September 1, 2023; and

**IT IS FURTHER ORDERED, ADJUDGED AND DECREED THAT** if the Debtor fails to make the Cure Payments specified above or fails to make any regular monthly payment or the additional cure payment within thirty (30) days of the date the payment is due, then the Association may obtain an Order Vacating the Automatic Stay as to the Collateral by filing, with the Bankruptcy Court, a Certification specifying the Debtor's failure to comply with this order. At the time the Certification is filed with the court, a copy of the Certification shall be sent to the Chapter 13 Trustee, the Debtor, and the Debtor's attorney.

WE HEREBY CONSENT TO THE FORM  
AND ENTRY OF THIS CONSENT ORDER:

McGovern Legal Services, LLC  
Attorneys for Mountainview at Greenbrook  
Condominium Association, Inc.

  
MARLENA S. DIAZ-COBO, ESQ.

9/26/23  
DATE

  
BRUCE C. TRUESDALE, ESQ.  
Attorney for Debtor

9/26/2023  
DATE